

February 2005

Section 9
Environmental Protection Act
R.S.O. 1990

Guide to Completing the
Written Summary Required by the
Basic Comprehensive Certificate
of Approval (Air & Noise)

PIBS 5007e

Protecting our environment.



FOREWORD

This document has been produced by the Environmental Assessment and Approvals Branch as an example of the annual Written Summary required by the Basic Comprehensive Certificate of Approval (CofA). The ministry is providing this information in response to questions regarding the format, content and minimum information requirements of the Written Summary.

The purpose of the Written Summary is to enable the ministry to track the modifications conducted at a facility. The attached Written Summary provides a hypothetical example for a fictional company. The example also contains sample table formats. The intent of this example is to assist companies in fulfilling their requirements under their CofA. The content required in a Written Summary is set out as a condition of approval in the Basic Comprehensive CofA, Basic Comprehensive CofA holders should check the actual wording of their Basic Comprehensive CofA to determine the reporting requirements that they are required to meet.

Please note that conditions on the Basic Comprehensive CofA require the holder to maintain proof of the ongoing compliance with the Performance Limits of the Basic Comprehensive Certificate of Approval. This supporting information must be retained for inspection in accordance with your CofA. Companies are not required to provide this additional supporting information (such as source summary tables or supporting calculations) with the Written Summary.

While every effort has been made to ensure the accuracy of the information contained in this document, it should not be construed as legal advice.

The following information provides additional guidance on Basic Comprehensive CofA's:

- [Basic Comprehensive Certificates of Approval \(Air\) - User Guide](#) (updated April 2004) PIBS 4391e ; and
- [Basic Comprehensive Certificates of Approval \(Air\) - Fact Sheet](#), PIBS 4392e

To obtain the above documents or for more information about Certificates of Approval or to obtain an application package, please visit the Ministry of the Environment Internet site at <http://www.ene.gov.on.ca> or contact:

Ministry of the Environment
Environmental Assessment and Approvals Branch
2 St. Clair Ave W, Floor 12A
Toronto, ON M4V 1L5

Toll Free: 1-800-461-6290
Phone: 416-314-8001
Fax: 416-314-8452
Email: EAABGen@ene.gov.on.ca

COMPANY LETTERHEAD

Date

Section 9 Director
Ministry of the Environment
Environment Assessment and Approvals Branch
2 St. Clair Avenue West, Floor 12A
Toronto, ON
M4V 1L5

Re: Written Summary for Reporting Year XXXX
Basic Comprehensive Certificate of Approval (Air/Noise) Number _____

This is to confirm that **Company, Location**, Ontario operated in compliance with the Performance Limits set forth in our Basic Comprehensive Certificate of Approval as noted above.

The attached Written Summary provides the information required by **Condition 3.3** of the above noted CofA.

Sincerely,

Company Official
Title

c. Local District Office

XXXX Written Summary

Required by

Basic Comprehensive C of A (Air/Noise)

No. _____

Issued to:

Company Name

Submitted by:

**Company
Company Address**

Date

Prepared By:

**Company
Company Address**

**Table of
Attachments**

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1 INTRODUCTION

Company was issued Basic Comprehensive Certificate of Approval (Air/Noise) No. _____ (“Comprehensive CofA”) on (date). This Comprehensive CofA approves the sprocket manufacturing operation at the Facility and provides Limited Operational Flexibility to **Company**.

Condition 3.3 of the Comprehensive CofA requires **Company** to provide an annual Written Summary of activities undertaken in the previous calendar year. The Written Summary must include the following:

- (a) a signed statement that the *Facility* was in compliance with the *Performance Limits*;
- (b) a summary of *Modifications* that have taken place and have resulted in a change in the previously calculated concentration at the *Point of Impingement* for any *Compound of Concern* or resulted in a change in the sound levels reported in the *Acoustic Assessment Summary Table* at a *Point of Reception*
- (c) a list of all *Compounds of Concern* submitted to the *Air Standards Manager* for review;
- (d) a list of all new compounds used or produced at the *Facility* that may be emitted to the atmosphere but were not considered *Compounds of Concern* for the purposes of this *Certificate*;
- (e) a review of any changes to any *Ministry Point of Impingement Limit* undertaken in the past year that affect the *Compounds of Concern* emitted from the *Facility*;
- (f) a tabulated summary of the changes in the emission rate of all *Compounds of Concern* and the resultant increase or decrease in *Point of Impingement* concentration;
- (g) the *Emission Summary Table* for the *Facility* as of December 31 from the previous calendar year; and
- (h) the *Acoustic Assessment Summary Table* for the *Facility* as of December 31 from the previous calendar year.

Note: Company should check wording of their Comprehensive CofA for the exact reporting requirements.

Company (may be different than CofA holder) has prepared this Annual Written Summary of activities undertaken in the (reporting year) calendar year. This Written Summary is being provided to the local District Manager and the Section 9 Director.

The reporting year saw significant debottlenecking activities at the Facility. The Facility production rate increased from 800,000 sprockets per year in XXXX to 1,000,000 sprockets in XXXX. This equals the Facility Production Limit.

The covering letter signed by (Company Official, Title) fulfils the requirement that the **Company** provide a signed statement that the Facility operated in accordance with the Performance Limits of the Basic Comprehensive CofA. The ESDM Report and Acoustic Assessment Report that document compliance with these Performance Limits are available for inspection at the Facility by the ministry upon request.

The following information meets the remaining requirements of **Condition 3.3**.

2. SUMMARY OF MODIFICATIONS

Company made 3 Modifications to the facility under the Limited Operational Flexibility Conditions as part of the debottlenecking operations and as a result of a paint formulation change.

These modifications are summarized in Attachment 1 which contains the Modification Log for XXXX.

Note: Modification #1 is an example of a modification that does not need to be reported in the Written Summary as it does not change the concentration at POI. This modification must be recorded in the modification log.

Note: Updated Source Summary Tables should not be supplied with the Written Summary.

3. COMPOUNDS OF CONCERN SUBMITTED TO THE AIR STANDARDS MANAGER

Company submitted one Maximum Concentration Level Assessment to the ministry in XXXX. This Maximum Concentration Level Assessment was required because of the paint formulation change. This modification introduced two new Compounds of Concern that do not have Ministry POI Limits and increased the concentration at Point of Impingement for one Compound of Concern with no Ministry POI Limits above the value reviewed by the ministry in the ESDM Report submitted with the application for the Basic Comprehensive CofA.

The Maximum Concentration Level Assessment was acknowledged by the ministry on Date. No further Correspondence was received from the ministry regarding this Maximum Concentration Level Assessment. Company refrained from making the Modification until 30 working days from the acknowledgement in accordance with requirements of the Basic Comprehensive CofA.

Attachment 2 provides a summary of the Compounds of Concern submitted to the Air Standards Manager.

Note: The MCL Assessment Submission or MSDS sheets should not be supplied with the Written Summary.

4. NEW COMPOUNDS NOT CONSIDERED COMPOUNDS OF CONCERN

As outlined in the ESDM Report submitted with the application for the Basic Comprehensive CofA Company has a detailed WHMIS new substance review program for all compounds used at the Facility. Three new compounds were identified through this program that are used by the Maintenance Department. These compounds are used in very small quantities and meet the conditions outlined in the ESDM Report submitted with the application for the Basic Comprehensive CofA to be considered insignificant

Attachment 3 provides a summary of the new compounds not considered Compounds of Concern.

Note: MSDS Sheets should not be supplied with the Written Summary.

5. MINISTRY CHANGES TO POINT OF IMPINGEMENT LIMITS

The Ontario Ministry of the Environment as of December 31st XXXX listed Information Drafts for XX new substances for review on the Environmental Bill of Rights, Environmental Registry.

Three compounds of concern released by Company were included in these information drafts, namely acetone, isopropyl alcohol and xylene. The current POI concentration of each of these compounds are below the proposed effects based standards.

6. SUMMARY OF EMISSION RATES FOR COMPOUNDS OF CONCERN

As a result of the modifications listed in Section 2, seven Compounds of Concern emission rates were changed. All Compounds of Concern remained in compliance with the Ministry POI Limits or the Maximum Concentration Level Assessments accepted by the Air Standards Manager.

Attachment 4 provides a summary of the changes to the emission rates for the Compounds of Concern.

Note: Source Summary Tables should not be supplied with the Written Summary.

7. EMISSION SUMMARY TABLE

The Emission Summary Table is provided in Attachment 5 for the Facility as of December 31, XXXX

8. ACOUSTIC ASSESSMENT SUMMARY TABLE

The Acoustic Assessment Summary Table is provided in Attachment 6 for the Facility as of December 31, XXXX

Attachment 1

Summary of Modifications

BASIC COMPREHENSIVE CofA MODIFICATION LOG

COMPANY CofA # _____

Date Changed	Description of Change	Emission Summary and Dispersion Modelling Report Changes
January 15, XXXX	Relocate the stacks serving painting process - no changes to the emissions from the source.	Site Plan updated showing the new stack location Modified stack information added to the Source Summary Table No changes required to the dispersion modelling or Emission Summary Table
July 25, XXXX	Add a dust collector system on expanded grinding operations.	Site Plan updated showing the new stack location Source 13 added to the Source Summary Table and updated the Grinding Operations Source Description Sheet, sample calculations updated Dispersion modelling output and Emission Summary Table updated
November 17, XXXX	Paint Reformulation – paint supplier modifications and addition of Candyapple Grey paint colour.	Updated the Paint Spray Booths Source Description Sheet added new MSDS Sheets to ESDM Report Appendix Source Summary Table updated to include modified emission rates Dispersion modelling output and Emission Summary Table updated

Revision Date: December 31, xxxx

Attachment 2

Compounds of Concern submitted to the Air Standards Manager

COMPOUNDS OF CONCERN SUBMITTED TO THE AIR STANDARDS MANAGER
COMPANY CofA # _____

Date MCL Assessment Submitted	Modification	Compound of Concern	CAS Number	Maximum ¹/₂ Hour Emission Rate (g/s)	Predicted Concentration at POI (µg/m³)
April 1, XXXX	Paint Reformulation	2 Methyl bivalve alcohol ¹	137-32-6	0.31	20.30
		Amyl xmlbyla ¹	71-41-0	0.42	27.50
		Propangalaticanol ²	1569-01-03	0.05	3.27

Notes: 1- New Compound of Concern

2 - Concentration at POI of Compound of Concern increased above level in ESDM Report submitted with application for Comprehensive CofA

MCL = Maximum Concentration Level Assessment conducted in accordance with the Basic Comprehensive CofA User Guide, dated April 2004

CAS Number = Chemical Abstracts Series Number

g/s = grams per second

µg /m³ = micrograms per cubic meter

POI = Point of Impingement

Revision Date: December 31, xxxx

Note: These compounds are fictional compounds that are included to illustrate the proper format for a submission and the predicted concentration level at point of impingement is for demonstration purposes only

Attachment 3

New Compounds not Considered Compounds of Concern

NEW COMPOUNDS NOT CONSIDERED COMPOUNDS OF CONCERN

COMPANY CofA # _____

Date Introduced	Compound	CAS Number
March 22, XXXX	Helium	7440-59-7
April 17, XXXX	Neon	7440-01-9
November 21, XXXX	Polypropagone*	1234-56-7

Notes: CAS Number = Chemical Abstracts Series Number

***Note: This compound is fictional that is included to illustrate the proper format for a submission and for demonstration purposes only**

Attachment 4

Summary of Changes in Emission Rates

TABULATED SUMMARY OF CHANGES IN EMISSION RATES FOR ALL COMPOUNDS OF CONCERN AND THE RESULTANT INCREASE OR DECREASE IN POINT OF IMPINGEMENT CONCENTRATION

COMPANY CofA # _____

Compound of Concern	CAS Number	Previous Calendar Year Emission Rate (g/s)	Previous Calendar Year POI ½ Hour Concentration (µg/m ³)	Modified Emission Rate (g/s)	Modified POI ½ Hour Concentration (µg/m ³)	% Increase (+) OR Decrease (-) in POI Concentration	Comments
Particulate matter	N/A	0.54	35.45	0.62	40.60	15%	
Toluene	108-88-3	13.12	859.58	12.12	793.64	-8%	
Titanium dioxide ¹	13463-67-7	N/A	N/A	0.01	0.65	new compound	
Ferric oxide	1309-37-1	0.09	5.69	N/A	0.00	-100%	no longer used
2 Methyl bivalve alcohol ^{1 *}	137-32-6	N/A	N/A	0.31	20.30	new compound	MCL Submitted April 1, XXXX
Amyl xmlbyla ^{1 *}	71-41-0	N/A	N/A	0.42	27.50	new compound	MCL Submitted April 1, XXXX
Propangalaticanol ^{2*}	1569-01-3	0.03	2.22	0.05	3.27	47%	MCL Submitted April 1, XXXX

Notes:

- 1- New Compound of Concern
- 2 - Concentration at POI of Compound of Concern increased above level in ESDM Report submitted with application for Comprehensive CofA
- CAS Number = Chemical Abstracts Series Number
- g/s = grams per second
- µg/m³ = micrograms per cubic meter
- POI = Point of Impingement
- N/A = not applicable
- MCL = Maximum Concentration Level Assessment conducted in accordance with the Basic Comprehensive CofA User Guide, dated April 2004

Revision Date: December 31, xxxx

***Note: These compounds are fictional compounds that are included to illustrate the proper format for a submission and the predicted concentration level at point of impingement is for demonstration purposes only**

Attachment 5

Emission Summary Table

EMISSION SUMMARY TABLE
COMPANY CofA # _____

Contaminant	CAS Number	Aggregate Emission Rate (g/s)	Maximum Ground Level POI Concentration ($\mu\text{g}/\text{m}^3$)	Regulatory Criterion ($\mu\text{g}/\text{m}^3$)	% of Criterion
Particulate matter	N/A	0.62	40.60	100	41%
Toluene	108-88-3	12.12	793.64	2,000	40%
Methyl isobutyl ketone	108-10-1	2.34	153.23	1,200	13%
Methyl alcohol	67-56-1	21.70	1420.96	12,000	12%
2-Ethoxyethyl acetate	111-15-9	0.29	18.99	220	9%
Glycol Ether EE	110-80-5	0.96	62.86	800	8%
Methyl ethyl ketone ¹	78-93-3	27.91	1827.60	30,000	6%
Nitrogen oxides	10102-44-0	0.23	15.06	500	3%
Acetone ²	67-64-1	21.70	1420.96	48,000	3%
Isopropyl alcohol ²	67-63-0	2.83	185.31	24,000	1%
Titanium dioxide	13463-67-7	0.01	0.65	100	1%
Xylene ²	1330-20-7	0.14	9.17	2,300	0.4%
Ethanol	64-17-5	0.59	38.63	19,000	0.2%
Sulphur dioxide	7446-09-5	0.01	0.65	830	0.1%
N-butyl alcohol	71-36-3	0.02	1.31	2,278	0.1%
Hexamal *	12-34-7	2.87	187.93	Max GLC	\leq Max GLC
Ethaname *	76-543-01	0.51	33.40	Max GLC	\leq Max GLC
2 Methyl bivalve alcohol *	137-32-6	0.31	20.30	MCL	\leq MCL
Amyl xmlbyla *	71-41-0	0.42	27.50	MCL	\leq MCL
Propangalaticanol *	1569-01-3	0.05	3.27	MCL	\leq MCL

Notes:

- ¹ Methyl ethyl ketone has a proposed future effects based standard of 3000 $\mu\text{g}/\text{m}^3$
- ² These compounds have updated Standards proposed as per Ministry of the Environment Fact Sheet for 29 Air Pollutants dated June 21, 2004

CAS Number = Chemical Abstracts Series Number
g/s = grams per second
 $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter
POI = Point of Impingement
N/A = not applicable
Max GLC = Maximum Ground Level Concentration submitted with original ESDM Report provided with the application
MCL = Maximum Concentration Level Assessment conducted in accordance with the Basic Comprehensive CofA User Guide, dated April 2004

Revision Date: December 31, xxxx

***Note: These compounds are fictional compounds that are included to illustrate the proper format for a submission and the predicted concentration level at point of impingement is for demonstration purposes only**

Attachment 6

Acoustic Assessment Summary Table

ACOUSTIC ASSESSMENT SUMMARY TABLE
COMPANY CofA # _____

Point of Reception ID	Point of Reception Description	Sound Level at Point of Reception (L _{eq})	Verified by Acoustic Audit (Yes/No)	Performance Limit (L _{eq})	Compliance with Performance Limit (Yes/No)
POR1	House to North	46 dBA	No	54 dBA ¹	Yes
POR2	House to East	46 dBA	No	52 dBA ¹	Yes
POR3	Nursing Home to South	41 dBA	No	50 dBA ²	Yes
POR4	School to West	48 dBA	No	50 dBA ²	Yes

Notes: ¹ Performance Limit set based on ambient background concentration as outlined in the original Acoustic Assessment Report provided with the application

² Performance Limit set based on exclusionary limit for daytime (07:00 to 19:00 hours) operation in a Class 1 Area as outlined in ministry publication NPC-205

ID = Unique Identification name assigned to the Point of Reception

L_{eq} = one hour equivalent sound level

dBA = A weighted decibels

Revision Date: December 31, xxxx